

Remedium

November 6, 2008

U.S. Environmental Protection Agency
EPR-SR
1595 Wynkoop Street
Denver, CO 80202

Attn.: Ms. Bonita Lavelle

Subject: OU3 RI/FS of the Libby Asbestos Site
Monthly Progress Report – October 2008

Robert J. Medler
Director
Remedium Group, Inc.

A Subsidiary of W. R. Grace & Co.
6401 Poplar Ave., Suite 301
Memphis, TN 38119-4840

Tel: (901) 820-2024
Fax: (901) 820-2061
Email: Robert.J.Medler@grace.com

Dear Bonnie:

This progress report describes work completed during the month of October 2008, in accordance with Section IX of the Administrative Settlement Agreement and Order on Consent for Remedial Investigation/Feasibility Study dated September 2007. A discussion of the actions taken, sampling results, planned activities, modifications, problems encountered, potential issues, anticipated delays, and solutions developed is provided below. Information by contractor is reported separately.

MWH

A. ACTIONS TAKEN

The following is a summary of the actions taken and progress made during the month of October for Phase II A activities.

- Element 4 continuous precipitation and flow monitoring continued at station LRC-06, LRC-02, and CC-02 throughout October. No rain storms sufficient to cause discernable increased flows at these stations occurred during October, thus no storm-event samples were collected.
- Continued bi-weekly ambient air monitoring at eight stations at OU3. The eighth and final round was concluded on October 17, 2008.
- The second round of groundwater sampling commenced on September 29 and concluded on October 1. All scheduled samples were collected from four of the five scheduled monitoring wells; samples could not be collected from Well H, which was dry.

B. SAMPLING RESULTS

Through October 2008, LA analytical results and re-issued, lab-corrected LA analytical reports for Phase I samples have continued to be issued by the analytical laboratory. Results for Phase IIA, Element 1 surface water and sediment samples and Element 2 and Element 3 surface water samples for LA analyses continued to be issued by the analytical laboratory throughout October 2008. Analytical results for the eighth (and final) round of ambient air sampling had been received by the end of October.

C. PLANNED ACTIVITIES FOR NEXT TWO MONTHS

The following tasks are scheduled to be performed over the next two months.

- Continue Element 4 automated, continuous precipitation and flow monitoring at stations LRC-06, LRC-02, and CC-02 until November 10, 2008. Although the Phase II Part A SAP called for Element 4 monitoring through September 30, monitoring was continued beyond the specified period in an effort to collect storm-event samples at stations LRC-06 and LRC-02. Because no storm events sufficient to increase stream flow by 100 percent (the sampling-event trigger specified in the SAP) occurred during the 2008 sampling season, flow data will be downloaded from the ISCO samplers and the equipment will be removed from OU3 for winter storage.
- Prepare the Field Sampling Summary Report for Phase II.

D. MODIFICATIONS/PROBLEMS ENCOUNTERED/POTENTIAL ISSUES/ANTICIPATED DELAYS/SOLUTIONS DEVELOPED/IMPLEMENTED

- None.

Parametrix

The following is a summary of the actions taken and progress made during the month of October for Phase II C activities.

A. ACTIONS TAKEN

- Completed ecological field sampling activities on October 9, 2008. Sampling activities included: macroinvertebrate and fish population work in Site and reference area waterbodies; and sediment sampling in Site and reference area waterbodies for toxicity bioassays, and LA/chemistry analyses.
- Uploaded all remaining FSDS forms and field notebook information to SRC database.
- Shipped all biological and sediment samples on October 9, 2008 under Chain of Custody via express overnight delivery to respective laboratories.
- Uploaded Chain of Custody Forms to SRC database.
- Provided answers to questions raised by EPA regarding the RBT histopathology Standard Operating Procedure.
- Completed demobilization activities (equipment cleaning, shipping, restocking, etc.) between October 10 -17, 2008.
- Participated on conference calls with EPA and USFWS regarding Rainbow Trout (RBT) water samples and issues with LA concentrations.
- Shipped a single water sample associated with the RBT toxicity bioassay for further analysis of LA as requested by EPA.

- Participated on conference call with EPA and USFWS regarding LA concentration issues associated with Sediment Toxicity Bioassays and need for protocol modifications to evaluate sediment pore water LA concentrations.

B. SAMPLING RESULTS

- None yet.

C. PLANNED ACTIVITIES FOR NEXT TWO MONTHS

The following tasks are scheduled to be performed over the next two months:

- Modify sediment toxicity bioassay protocol to reflect sampling of pore water for LA at beginning and end of test.
- Set up and initiate Part 1 sediment toxicity bioassays using revised protocol.
- Conduct macroinvertebrate enumeration and identification.
- Begin evaluation of fish and macroinvertebrate population information to support data report preparation.
- Receive RBT histopathology assessment from Oregon State University.
- Resolve issue of LA concentration discrepancies in RBT water samples.
- Initiate preparation of draft RBT water toxicity bioassay report.

D. MODIFICATIONS/PROBLEMS ENCOUNTERED/POTENTIAL ISSUES/
ANTICIPATED DELAYS/SOLUTIONS DEVELOPED/IMPLEMENTED

- None.

If you have any questions regarding this progress report, please call Bob Marriam at (901) 820-2023.

Sincerely,



Robert J. Medler
Project Coordinator
Remedium Group, Inc.

cc: Michael DeDen - MWH
Lynne Gardner
Catherine LeCours -- Montana DEQ
Robert Marriam
Sue Robinson - Parametrix